



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

December 17, 2020

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

MS. CHRISTINA SWICK  
WESTRADE INVESTMENTS INC.  
14027 MEMORIAL DRIVE #285  
HOUSTON, TX 77079

Dear Ms. Swick:

Subject: Transfer of Pesticide Registrations and Data From Company Number 95172 to Company Number 98763

Pursuant to your request in your letter and transfer agreement of November 11, 2020, we have approved the transfer of the following registrations from PRORICE LLC., company number 95172 to WESTRADE INVESTMENTS INC., company number 98763.

The effective date of these changes is the date of this letter.

<u>Registered Products</u>	<u>Old EPA Reg. No.</u>	<u>New EPA Reg. No.</u>
PROPANIL TECHNICAL	95172-1	98763-1

You may continue to sell and distribute existing product stocks, bearing the transferor's label, for 18 months from the date of this letter. Per your request for an 18-month transition period, you may also continue to produce new product bearing the transferor's existing, previously approved label, and sell and distribute that new product, for 18 months after the date of this letter, but you may not sell and distribute product bearing the transferor's label after that 18-month period. Each product container or package bearing the transferor's label that is sold or distributed after the effective date of this product registration transfer must be clearly and accurately marked with the batch number, lot number, or other descriptive designation used to identify the product in your records.

Supplemental distribution agreements of registered products do not transfer with the Section 3 registration. It is your responsibility as the registrant to notify any and all supplemental distributors of the transferred product(s) of this transfer agreement. If you wish to enter into supplemental distribution agreements of your product(s) under this new registration, the form "Notice of Supplemental Distribution of a Registered Pesticide Product," EPA Form 8570-5, must be submitted to the Agency for each supplemental distributorship.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or labeling may require EPA review and approval prior to distribution or sale of the product containing the new registration number. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

Regarding deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The annual maintenance fee is based solely on the total number of active section 3 and section 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period or the affected registrations may be canceled.

The Agency acknowledges it has received a request for data transfer dated November 11, 2020 to transfer data ownership from the transferor to the transferee. The data transfer is effective the date of this letter. After this date **WESTRADE INVESTMENTS INC.** will be considered the data owner. This action will not automatically reflect on the Data Submitters List. If you want to be added to the Data Submitters List, you must submit a request to:

Document Processing Desk (DSL)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

By copy of this letter we are informing the transferor of these changes. If you have any questions about this transfer approval, please send all inquiries to: [companyownershipchanges@epa.gov](mailto:companyownershipchanges@epa.gov).

Sincerely,



Kimberly Smith, Chief  
Information Services Branch  
Information Technology & Resource Management Div. (7504P)

cc: MS. CHRISTINA M. SWICK  
LEWIS & HARRISON, AGENT FOR  
PRORICE LLC.  
2461 SOUTH CLARK STREET, SUITE 710  
ARLINGTON, VA 22202-

**RE: L\_95172\_RAD\_98763\_12\_17\_2020**

CHECKLIST FOR TRANSFER of REGISTRATION and DATA			
Transferor: PRORICE LLC.		Co. #: 95172	
Transferee: WESTRADE INVESTMENTS INC		Co. #: 98763	
Transfer Type: Registration and Data		Date: LTR: 11/11/2020; PP: 12/01/2020	
CHECK	REQUIREMENTS		
✓	Entry into Log Book	✓	Company info checked in OPPIN and printed
✓	Products verified in OPPIN (active/cancelled/suspended, etc.)	✓	Maintenance Fee Records checked (active/cancelled/SLN/fee paid)
	<b>Ensure That the Package Contains the Following:</b>	<b>COMMENTS</b>	
✓	(1) XFER Agreement Has <b>Original Signatures, Date Signed, Names and Titles</b> of signatories from both parties?		
✓	(2) Name, Address & State of Incorporation of Transferor (& Co. #)	DE	
✓	(3) Name, Address & State of Incorporation of Transferee (& Co. #.)	TX	
✓	(4) Name(s) / List & EPA Registration No.(s) of the product(s) being transferred.	95172-1 and 7 MRIDs (No Exclusive Use)	
✓	(5) Statement that the Transferor transfers to the Transferee all right, title, and interest in the EPA registration(s) and data listed in the document.		
✓	(6) Statement that the transferred registration(s) shall not serve as collateral or otherwise secure any loan or other payment arrangement or executory promise. The reg'n(s) shall not revert to the Transferor unless a new transfer agreem't is submitted to & approved by the Agency		
✓	(7) Description of the general nature of the underlying transaction, e.g., merger spin-off, bankruptcy (no financial info. need be disclosed)	SALE	
✓	(8) Statement that the Transferor and Transferee understand that any false statement may be punishable under law (18 USC1001)		
✓	(9) An acknowledgement by Transferee that its rights & duties concerning the reg'n under FIFRA and 40 CFR, Ch. 1 will be deemed by EPA to be the same as those of the Transferor at the time the transfer is approved.		
✓	<b>DATA</b> Data transfers must also include: (1) Name of the study; (2) Is study exclusive use (if so, when does exclusive use expire); (3) Name of person or lab that <u>conducted</u> the study; (4) Date study submitted to EPA; (5) MRID or other EPA administrative number.		
	(10) <b>Notarized</b> Affirmation Statement from Transferor <b>Affirming</b> that:		
✓	<b>(A)</b> The person signing the transfer agreement is authorized by the registrant (and/or original data submitter) to bind the Transferor.		
✓	<b>(B)</b> No court order prohibits the transfer, & that any required court approvals have been obtained.		
✓	<b>(C)</b> The transfer is authorized under all relevant Federal, State & local laws, & all relevant corporate charters, bylaws, partnerships, or other agreements.		
	<b>Note:</b> It is preferable that the Affirmation Statement be signed by someone <u>other</u> than the person signing the transfer agreement.		
✓	Look in OPPIN for Next Registration Number for Transferee	98763-1	
LV	OPPIN Work (Actual Transfer)		
LV	Generate Letter and Give to Branch Chief for Signature		
Copies of Letter Made and Distributed/Mailed			
LV	Copy mailed to Transferor	LV	Sent copies to: JFR & PM25.
LV	Copy mailed to Transferee	LV	Copy placed In Transfer File
LV	Updated Log Book	<b>Completed: L. Vaughn      Date: 12/17/2020</b>	
Comments: This is a RAD XFER received on 12/01/2020. The letter designates "New Production" during the "18-month grace period". So, I used the "NEW" first Paragraph language in the transfer approval letter. - LWV			

## Vaughn, Louis

---

**From:** Vaughn, Louis  
**Sent:** Friday, December 18, 2020 12:10 AM  
**To:** 'Miriam.Eichelberger@duwest.com'  
**Cc:** 'Christina Swick'; Schmid, Emily; Dillard, Sylvia  
**Subject:** Completed Transfer 95172\_RAD\_98763\_12\_17\_2020  
**Attachments:** APPENDIX A\_95172\_RAD\_98763\_12\_01\_2020.pdf; L\_95172\_RAD\_98763\_12\_17\_2020.pdf

Attached, is the requested Product Registration and Data Transfer from **PRORICE LLC. (95172)** to **WESTRADE INVESTMENTS INC. (98763)**. As a result of a sale, you transferred one product registration and 7 MRIDs (No Exclusive Use).

### **Product 95172-1 is now product 98763-1**

For Change of Address or Agent:

<http://www2.epa.gov/pesticide-registration/pesticide-registration-manual-how-report-changes-company-name-or-address>

For Product Transfers, Data Transfers or Company Numbers Transfers:

<http://www2.epa.gov/pesticide-registration/pesticide-registration-manual-chapter-16-transfer-product-registrations-and>

For Other Information: <http://www2.epa.gov/pesticide-registration/pesticide-registration-manual>

Louis Vaughn, MS  
Information Management Specialist  
U.S. Environmental Protection Agency  
OCSPP/OPP/ITRMD/ISB  
vaughn.louis@epa.gov

# ProRice LLC.

November 11, 2020

Document Processing Desk (XFER)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202

Dear Mr. Vaughn:

**Subject: PRORICE, LLC. (TRANSFEROR) (EPA Company Number 95172)  
Transfer of EPA Product Registration(s) and Data to  
WESTRADE INVESTMENTS, INC. [TRANSFeree] (EPA Company Number 98763)**

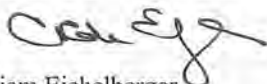
**PRORICE, LLC. (EPA Company Number 95172)** requests that the U.S. Environmental Protection Agency transfer certain EPA registered products to **WESTRADE INVESTMENTS, INC. (EPA Company Number 98763)**.

A Transfer Document, executed by authorized representatives of both parties, provides the required documentation and affirmations delineated at 40 CFR §152.135(b) and (c) to effect this request for transfer of EPA product registrations. The Transfer Document is enclosed with this letter.

In support of the sale of the products and the registrations from **PRORICE, LLC** to **WESTRADE INVESTMENTS, INC.**, the sale agreement provides a **transition period of eighteen months** after EPA's approval of the transfer of the registrations and corresponding product labels. **PRORICE, LLC.** provides the licenses and other necessary rights to use the company name and logo during the transition period. This allows for the continuation of production during this period with seamless transition of the product registrations while maintaining supply of the product to customers. During the transition period, transferee completes internal activities to ensure manufacturing and supply processes are established to produce product bearing **WESTRADE INVESTMENTS, INC.** registered label upon obtaining the necessary state registrations. In addition, the sales agreement provides, as necessary, transitional services including regulatory, manufacturing, supply, and product services (e.g., call center) support for this transitional period.

Consistent with the sale agreement explained above for the registered products subject to this transfer, **PRORICE, LLC.** requests that EPA allow the labels which currently appear on **PRORICE, LLC.** product to continue to be used up to 18 months after the effective date of the transfer.

Under the terms of 40 CFR §152.135(d), I understand that the Agency will approve the transfer without requiring that the Transferee obtain new registrations and that the Agency will notify the Transferor and the Transferee of its approval of this transfer request.



Miriam Eichelberger  
ProRice LLC

## REGISTRATION and DATA TRANSFER AGREEMENT

(Used for Transfer of Registrations and Data Ownership)

Reference: 40 CFR § 152.135 and 40 CFR § 152.98

Notification is made this 11 day of NOVEMBER, 2020, by and between the TRANSFEROR **PRORICE, LLC** and the TRANSFEREE **WESTRADE INVESTMENTS, INC.** In consideration of mutual covenants and agreements made and/or for good and valuable consideration, the parties agree as follows:

I. **PARTIES**. For the purpose of this Agreement, "Parties" shall mean:

a) **TRANSFEROR** (Current Registrant and/or data submitter):

EPA Company Number: 95172

Name: PRORICE, LLC.

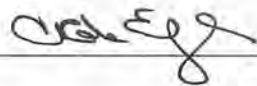
Address: c/o Lewis & Harrison, LLC. – 2461 South Clark Street, Suite 710

City: Arlington State: VA Zip: 22202

State of Incorporation: Delaware

Name of Authorized Company Official or Agent: Miriam Eichelberger

Title of Authorized Company Official or Agent: Principal

Original Signature of Authorized Company Official or Agent: 

Date Signed: 11/11/20

b) **TRANSFEREE** (Company Receiving Registrations and/or data):

EPA Company Number: 98763

Name: WESTRADE INVESTMENTS, INC.


Address: 14027 Memorial Drive #285

City: Houston State: TX Zip: 77079

State of Incorporation: Texas

Name of Authorized Company Official or Agent: Juan Salvador Ortega

Title of Authorized Company Official or Agent: Director

Original Signature of Authorized Company Official or Agent: 

Date Signed: 11/11/2020



2. **REGISTRATION.** For the purpose of this Agreement, "Registration" shall mean the following EPA registration number(s) and product name(s):

EPA Registration Number	Product Name
95172-1	Propanil Technical

3. **REGISTRATION ASSIGNMENT.** Transferor does hereby irrevocably transfer to the Transferee all right, title and interest in the EPA registrations listed in this document.

4. **DATA ASSIGNMENT.** Transferor does hereby irrevocably transfer to the Transferee all rights, titles and interest in the items of data named herein. Data that are specifically part of this ASSIGNMENT are listed in APPENDIX A.

5. **WARRANTY OF TITLE.** Transferor warrants that it is the lawful owner of the property hereby conveyed and that such property (registrations and/or data) shall not serve as collateral or otherwise secure any loan or other payment arrangement or executory promise, and that the registration(s) and/or data shall not revert to the transferor unless a new transfer agreement is submitted to and approved by the Agency.

6. **REASON FOR TRANSFER.** SALE

7. **FALSE STATEMENTS.** The Transferor and Transferee understand that any false statement regarding these documents may be punishable under 18 U.S.C. 1001.

8. **TRANSFeree ACKNOWLEDGEMENT.** Transferee acknowledges that his rights and duties concerning registration under FIFRA and Title 40, Chapter 1, Subchapter E of the Code of Federal Regulations will be deemed by EPA to be the same as those of the Transferor at the time the transfer is approved.

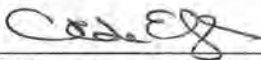


## TRANSFEROR AFFIRMATION STATEMENT

Reference: 40 CFR § 152.135(c) and 40 CFR § 152.98(b)

The TRANSFEROR **PRORICE, LLC.** hereby affirms that:

- (1) The person signing the transfer agreement for the Transferor is authorized by the registrant and/or original data submitter to bind the Transferor;
- (2) No court order prohibits the transfer, and any required court approvals (if any) have been obtained; and
- (3) The transfer is authorized under all relevant Federal, State and local laws and all relevant corporate charters, bylaws, partnerships, or other agreements.



\_\_\_\_\_  
[Signature of Transferor's Affirmation Official or Agent]

Date: 11/11/20

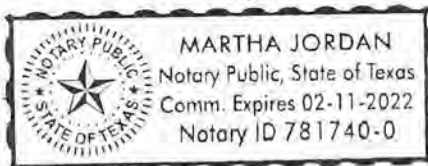
MIRIAM EICHELBARGER, PRINCIPAL

\_\_\_\_\_  
[Printed Name and Title of Affirmation Official or Agent]

[Note: This Affirmation Statement must be notarized.]

### NOTARIAL CERTIFICATE





## APPENDIX A

Reference: 40 CFR § 152.98 (a) (3)

For Exclusive Use see: 7 USC § 136 et seq., Federal Insecticide Fungicide Rodenticide Act (FIFRA), Sec. 3 (c) (1) (F)

#	MRID or other Identifying Administrative Number	Name of the Study	Name of Person or Lab that Conducted the Study	Date the Study was Submitted to EPA	Is Exclusive Use Claimed? (Y or N)	If Yes then, Date Period of Exclusive Use Ends
1	50904100	Prorice, Inc. (2019) Submission of Product Chemistry Data in Support of the Application for Registration of Propanil Technical. Transmittal of 7 Studies.	Not Applicable	7/24/2019	N	
2	50904101	Tek, V. (2019) Propanil Technical: Product Identity and Composition; Description of Materials Used to Produce the Product and the Production Process; Discussion of Potential Impurity Formation; Certified Limits and Enforcement Analytical Method. Unpublished study prepared by Prorice, Inc. 49p.	PRORICE LLC.	7/24/2019	N	
3	50904102	Skopec, J. (2019) Preliminary Analyses of Five Representative Production Batches of Propanil Technical Grade Active Ingredient (TGA) to Determine Percent Propanil. Project Number: WW/047. Unpublished study prepared by AgriFor Scientific Party Limited. 186p.	AGRIFOR SCIENTIFIC PTY LTD.	7/24/2019	N	
4	50904103	Harrison, E. (2019) Analysis of Propionic Acid Content in Propanil Technical. Unpublished study prepared by Prorice, Inc. 18p.	PRORICE LLC.	7/24/2019	N	
5	50904104	Sinning, D. (2018) Propanil TC: Enforcement Analytical Method for the Determination of Propanil by High Performance Liquid Chromatography. Project Number: 46929/EAM. Unpublished study prepared by Product Safety Laboratories. 15p.	HELM AG	7/24/2019	N	
6	50904105	Wo. C. (2018) Propanil TC: Physical and Chemical Characteristics: Color, Physical State, Odor, Oxidation/Reduction, Flammability, pH, and Bulk Density. Project Number: 46930, P801, 171108/2H. Unpublished study prepared by Product Safety Laboratories. 15p.	HELM AG	7/24/2019	N	
7	50904106	Sinning, D. (2019) Propanil TC: Storage Stability and Corrosion Characteristics. Project Number: 46929, P800, 171108/2H. Unpublished study prepared by Product Safety Laboratories. 37p.	HELM AG	7/24/2019	N	

**Summary Information For  
Product Registration - Section 3  
95172-1**

**Registration #:** 95172-1  
**Registration Name:** [Propanil Technical](#)  
**Company:** [95172 - PRORICE LLC.](#)  
**Current Status:** [Active - Registered \(06-Oct-2020\)](#)  
**Restricted Use:** No

**Active Ingredients**

PC Code	CAS #	Ingredient Name	Percent Active
<a href="#">028201</a>	709-98-8	Propanil	98.43
Total Rows: 1			

**Organization:** RD / HB  
**Team:** Registration Division, Risk Management Team 25  
Baris, Reuben 202-566-2683  
**Child Resistant Package:** Product Involve CRP? N/A  
CRP Status? N/A  
CRP Certificate Acceptable? N/A  
CRP Certificate Decision Date: N/A  
Withdraw Date (if voluntary): N/A  
**Signal Word:** Caution  
**Physical Form:**  
**Pesticide Category:** HERBICIDE  
**Label Image:** [View Label Image](#)

---

**No Inert Ingredients**

Close

Print

**Study Information For  
Product Registration - Section 3  
95172-1**

MRID	Citation	Receipt Date
50904100	Prorice, Inc. (2019) Submission of Product Chemistry Data in Support of the Application for Registration of Propanil Technical. Transmittal of 7 Studies.	24-Jul-2019
50904101	Tek, V. (2019) Propanil Technical: Product Identity and Composition; Description of Materials Used to Produce the Product and the Production Process; Discussion of Potential Impurity Formation; Certified Limits and Enforcement Analytical Method. Unpublished study prepared by Prorice, Inc. 49p.	24-Jul-2019
50904102	Skopec, J. (2019) Preliminary Analyses of Five Representative Production Batches of Propanil Technical Grade Active Ingredient (TGAI) to Determine Percent Propanil. Project Number: WW/047. Unpublished study prepared by AgriFor Scientific Party Limited. 186p.	24-Jul-2019
50904103	Harrison, E. (2019) Analysis of Propionic Acid Content in Propanil Technical. Unpublished study prepared by Prorice, Inc. 18p.	24-Jul-2019
50904104	Sinning, D. (2018) Propanil TC: Enforcement Analytical Method for the Determination of Propanil by High Performance Liquid Chromatography. Project Number: 46929/EAM. Unpublished study prepared by Product Safety Laboratories. 15p.	24-Jul-2019
50904105	Wo, C. (2018) Propanil TC: Physical and Chemical Characteristics: Color, Physical State, Odor, Oxidation/Reduction, Flammability, pH, and Bulk Density. Project Number: 46930, P801, 171108/2H. Unpublished study prepared by Product Safety Laboratories. 15p.	24-Jul-2019
50904106	Sinning, D. (2019) Propanil TC: Storage Stability and Corrosion Characteristics. Project Number: 46929, P800, 171108/2H. Unpublished study prepared by Product Safety Laboratories. 37p.	24-Jul-2019
50904107	Wo, C. (2018) Propanil TC: Physical and Chemical Characteristics: UV /Visible Absorption, Melting Point, Boiling Point, Dissociation Constant, Partition Coefficient, Water Solubility, and Vapor Pressure. Project Number: 46931, P804/TGAI, 171108/2H. Unpublished study prepared by Product Safety Laboratories. 46p.	24-Jul-2019
Total Rows: 8		

XOR

**Summary Information For  
Company 95172, PRORICE LLC.**

**Company No:** 95172  
**Company Name:** PRORICE LLC.  
**Division Name:**  
**Office Name:**  
**Branch Name:**  
**Agent Name:** LEWIS & HARRISON  
**Agent Contact:** CHRISTINA M. SWICK  
**Agent Phone:** (202) 393-3903  
**Official Address:** 2461 SOUTH CLARK STREET, SUITE 710  
ARLINGTON , Virginia 22202  
UNITED STATES  
**Date of Current Update:** 16-Nov-2020  
**Reason for Current Update:** Letter from Company

XEE

**Summary Information For  
Company 98763, WESTRADE INVESTMENTS INC.**

**Company No:** 98763  
**Company Name:** WESTRADE INVESTMENTS INC.  
**Division Name:**  
**Office Name:**  
**Branch Name:**  
**Contact Name:** Christina Swick  
**Contact Phone:** (202) 393-3903  
**Agent Name:**  
**Official Address:** 14027 MEMORIAL DRIVE#285  
HOUSTON, Texas 77079  
UNITED STATES  
**Date of Current Update:** 22-Oct-2020  
**Reason for Current Update:** New Company